

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

BENJAMIN CURRY AND LATESSA  
NICOLE CURRY, ET AL

CIVIL ACTION NO. 2:15-cv-02002

VERSUS

JUDGE PATRICIA MINALDI

CISCON SERVICES, INC., CISCON  
SERVICES USA, LLC, AND JOHN DOE

MAGISTRATE JUDGE KAY

**ANSWER TO PETITION OF INTERVENTION  
OF ENERGY DRILLING COMPANY AND  
GREAT ALLIANCE INSURANCE COMPANY**

NOW INTO COURT, through undersigned counsel, come defendants, CISCON SERVICES, INC. and CISCON SERVICES USA, LLC (“Defendants”), who, for answer to the Petition of Intervention of Energy Drilling Company and Great Alliance Insurance Company (“Intervenors”), respond as follows:

1.

The allegations of paragraph 1 are denied for lack of sufficient information upon which to justify a belief therein.

2.

The allegations of paragraph 2 are denied for lack of sufficient information upon which to justify a belief therein.

3.

The allegations of paragraph 3 are denied for lack of sufficient information upon which to justify a belief therein.

4.

The allegations of paragraph 4 are denied for lack of sufficient information upon which to justify a belief therein.

5.

The allegations of paragraph 5 are denied for lack of sufficient information upon which to justify a belief therein.

6.

The allegations of paragraph 6 are denied for lack of sufficient information upon which to justify a belief therein.

And now further answering, defendants aver as follows:

7.

Neither these defendants, nor anyone for whom they would be responsible or liable, were guilty of any negligence or fault giving rise to the claims of the plaintiffs and the intervenors.

8.

Plaintiffs' injuries and damages, if any, were caused by the comparative fault of Benjamin Curry, consisting of 1) failure to keep a proper lookout, 2) failing to use reasonable care and caution, and 3) Any other acts of negligence which may be found during discovery.

9.

The damages of which the plaintiffs complain were caused by the fault of others for whom Defendants are not responsible.

WHEREFORE, premises considered, defendants, CISCON SERVICES, INC. and CISCON SERVICES USA, LLC, pray their answer to this Petition in Intervention be deemed good and sufficient, and that after all due proceedings and legal delays are had, there be judgment rendered herein in their favor and against intervenors, dismissing their claims at their cost, with prejudice, and for such other, further and different relief as justice and the equity of this case may require.

Respectfully submitted,

**THE THIBODEAUX LAW FIRM, L.L.C.**

BY:

s/ Jeffery D. Fruge  
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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2016, a copy of the above and foregoing Answer was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the court's electronic filing system.

s/ Jeffery D. Fruge  
JEFFERY D. FRUGE